

UNITED STATES DEPARTMENT OF JUSTICE
OFFICE OF THE UNITED STATES TRUSTEE
ROBERTA A. DeANGELIS
UNITED STATES TRUSTEE, REGION 3
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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:	:	
	:	Chapter 11
Martin Cadillac, LLC,	:	Case No. 10-29520 (RG)
	:	
Debtor.	:	
	:	

APPLICATION FOR ORDER APPROVING
APPOINTMENT OF TRUSTEE

The United States Trustee (the "Applicant") hereby applies to the Court pursuant to Fed. R. Bankr. P. 2007.1 for an Order Approving the Appointment of Trustee, and in support thereof, states:

1. The Applicant has appointed Jay Lubetkin as trustee in the above captioned case.
2. Counsel for the Applicant has consulted with the following parties in interest regarding the appointment of the trustee:

Gregory S. Kionoian, Esq.
Okin, Hollander & DeLuca, LLP
One Parker Plaza
Fort Lee, NJ 07024
(*Counsel for Debtor*)

John R. Skelton, Esq.
Bingham McCuthen LLP
One Federal Street
Boston, MA 02110
(*Counsel for Creditor General Motors*)

James D. McGinley, Esq.
Edwards Angell Palmer & Dodge, LLP
111 Huntington Avenue
Boston, MA 02199-7613
(*Counsel for Creditor Ally Financial, Inc.*)

Meaghan Tuohey-Kay, Esq.
Law Office of Meaghan Tuohey-Kay
532 Lafayette Avenue
Hawthorne, NJ 07506
(*Counsel for Timothy F. Martin*)

3. To the best of the Applicant's knowledge, the trustee's connections with the debtor, creditors, any other parties in interest, their respective attorneys and accountants, the United States Trustee, and persons employed in the Office of the United States Trustee, are limited to the connections set forth in the Verified Statement filed in support of this Application.

WHEREFORE, the Applicant requests entry of an Order Approving the Appointment of Jay Lubetkin as Trustee in the above captioned case.

DATED this 28th day of December 2010.

ROBERTA A. DeANGELIS
UNITED STATES TRUSTEE
REGION 3

By: /s/ Martha R. Hildebrandt
Martha R. Hildebrandt
Assistant United States Trustee